

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No. 04 CR 10314 RCL  
 )  
 (1) MANUEL E. PINALES, )  
 (2) JOSE ANTONIO CRUZ, )  
 a/k/a "Eduardo LNU" )  
 (3) LUIS R. CLAS, )  
 a/k/a "Cuba" )  
 (4) RICHARD PENA, and )  
 (5) TAJH M. WHITE )  
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GOVERNMENT'S MOTION TO EXCLUDE TIME  
FROM APRIL 21, 2005 THROUGH AND INCLUDING JUNE 6, 2005

The United States, with the assent of the above-named defendants, respectfully moves to exclude, in computing the time within which the trial of this matter shall commence under 18 U.S.C. §3161(c)(1), the time period from April 21, 2005, through and including June 6, 2005, the date of the next scheduled status conference. This continuance was requested by the defendants and is necessary to allow them time to review the voluminous discovery provided in this matter and prepare their cases. As such, the continuance serves the interests of justice.

For the foregoing reasons, exclusion of this time period serves the interests of justice and is appropriate under 18 U.S.C. §3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Maureen B. Hogan  
Maureen B. Hogan  
Assistant U.S. Attorney

Dated: April 21, 2005